



Mario Alba Jr.
MALba@csgrr.com

MEMO ENDORSED

January 11, 2007

SAN DIEGO • SAN FRANCISCO
NEW YORK • BOCA RATON
WASHINGTON, DC • HOUSTON
LOS ANGELES • PHILADELPHIA

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/14/08

VIA FACSIMILE

Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

Re: *The City of Edinburgh Council on Behalf of The Lothian Pension Fund vs. Vodafone Group Public Limited Company, et al., Case No. 07-cv-09921*

Dear Judge Castel:

My firm has recently been retained to represent certain institutional investors who wish to make a motion for appointment as lead plaintiff in the above-referenced action. Pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), this motion must be made by any class member who wishes to seek appointment as a lead plaintiff, whether or not they have previously filed a complaint in these actions, no later than 60 days following the publication of the first notice that was issued advising investors of the pendency of these actions. 15 U.S.C. §§ 78u-4(a)(3)(A) and (B). This notice was issued on November 15, 2007; accordingly, our clients must file their motion no later than January 14, 2008.

Your Honor's Individual Practices, however, require that "[f]or motions other than discovery motions, a pre-motion conference with the court is required for making any motion" Because of the strict deadline imposed by the PSLRA, we respectfully request leave from complying with this practice so that we may file our motion on January 14, 2008.

cc: Theodore Edelman (by facsimile)

Respectfully submitted,

Mario Alba Jr.
Mario Alba Jr.

Premotion conference required waived for all motions for appointment as lead plaintiff.
SO ORDERED
[Signature]
1-11-08